

William A. Burck
QUINN EMANUEL URQUHART & SULLIVAN LLP
1300 I Street NW Suite 900
Washington, D.C. 20005
212-849-7000
williamburck@quinnemanuel.com

Rachna Shah
VANGUARD LAW OFFICE PLLC
149 East 23rd St #334
New York, New York 10010
917-409-8350
rachna@vanguardlawoffice.com

Attorneys for Defendant
Jeyakumar Nadarajah

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

JEYAKUMAR NADARAJAH,

Defendant.

No. 23-CR-00891-CCC

Hon. Claire C. Cecchi

MOTION FOR CONTINUANCE

Defendant Jeyakumar Nadarajah, by and through undersigned counsel, respectfully moves for an Order continuing the above-referenced action and excluding time computed under the Speedy Trial Act of 1974, 18 U.S.C. § 3161 et. seq. In support of this motion, the Defendant states:

1. The failure to grant a continuance would deny counsel for the Defendant and counsel for the Government the reasonable time necessary for effective preparation in this matter, taking into account the exercise of due diligence.
2. Mr. Nadarajah consents to the aforementioned continuance.
3. The grant of a continuance likely will conserve judicial resources
4. A proposed order is included with this motion as **Exhibit 1**.

*** *** ***

For the foregoing reasons, the Defendant respectfully requests that this Court grant the Motion for Continuance and enter the proposed Order continuing the above-referenced action and excluding time computed under the Speedy Trial Act of 1974, 18 U.S.C. § 3161 et. seq.

//

//

//

Respectfully submitted,

Dated: New York, New York
January 31, 2024

QUINN EMANUEL URQUHART &
SULLIVAN LLP

By: /s/ William A. Burck
William A. Burck
51 Madison Avenue, 22nd Floor
New York, New York 10010
212-849-7000
williamburck@quinnemanuel.com

VANGUARD LAW OFFICE PLLC
Rachna Shah
149 East 23rd St #334
New York, New York 10010
917-409-8350
rachna@vanguardlawoffice.com

Attorneys for Defendant
Jeyakumar Nadarajah

CERTIFICATE OF SERVICE

I hereby certify pursuant to 28 U.S.C. § 1746 that on this date the annexed Motion for Scheduling Order was filed via the CM/ECF system for the United States District Court for the District of New Jersey thereby effectuating service upon all counsel of record via electronic means.

I certify under the penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on this 31st day of January, 2024.

/s/ William A. Burck
William A. Burck